

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

<b>Mount Vernon Fire Insurance Company,</b>	)	
	)	
<b>Plaintiff,</b>	)	<b>Case No. 1:22-cv-03816</b>
	)	
<b>v.</b>	)	<b>Judge Ronald A. Guzman</b>
	)	
<b>Jane Child Care Inc., et al.</b>	)	<b>Magistrate Judge Sheila Finnegan</b>
	)	
<b>Defendants.</b>	)	
	)	
	)	

**PLAINTIFF’S MOTION FOR JUDGMENT BY DEFAULT**

Plaintiff, Mount Vernon Insurance Company, pursuant to Federal Rule of Civil Procedure (“F.R.C.P.”) 55, moves this Court for judgment by default against Defendant Galyna Zaytseva.

In support of this motion, Plaintiff states as follows:

1. Plaintiff’s Complaint in this matter was filed on July 22, 2022. (Dkt. # 1).
2. Defendant Galyna Zaytseva was personally served on October 3, 2022. *See* Return of Service filed with the Court (Dkt. # 20).
3. No counsel has appeared on behalf of Defendant Galyna Zaytseva.
4. Defendant Galyna Zaytseva’s answer to Plaintiff’s Complaint was due 21 days after service on October 3, 2022, on or about October 24, 2022, and has failed to plead or otherwise defend and has neither served an answer, pleading, or motion on the Plaintiff, nor with the Court, in this matter.

WHEREFORE, Plaintiff moves that this Court enter a judgment as follows:

- A. Plaintiff has no duty to defend Galyna Zaytseva in the Underlying Lawsuits;
- B. Plaintiff has no duty to indemnify Galyna Zaytseva in the Underlying Lawsuits;

C. Grant any other relief this Court deems just and equitable under the circumstances.

Respectfully submitted,

Dated: January 3, 2023

**Counsel for Plaintiff**  
**Mount Vernon Fire Insurance Company**

/s/ Larry D. Mason  
Larry D. Mason  
Goldberg Segalla LLP  
222 West Adams Street  
Suite 2250  
Chicago, Illinois 60606  
Direct: 312-572-8444  
[lmason@goldbergsegalla.com](mailto:lmason@goldbergsegalla.com)

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of Plaintiff's **Motion for Judgment by Default** was served upon all counsel of record via the Court's ECF system this 3<sup>rd</sup> day of January 2023 and additionally via Certified Mail—Return Receipt Requested and First-Class U.S. Mail upon the following *pro se* defendant:

Galyna Zaytseva  
483 Blue Springs Drive  
Fox Lake, IL 60020

/s/ Larry D. Mason  
Larry D. Mason  
Counsel for Plaintiff  
Mount Vernon Fire Insurance Company

35020353.v1